

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)	
Plaintiff)	
v.)	CRIMINAL ACTION
)	NO. 05-1684-PBS
WILGEN ANIBAL BRITO-MELO,)	
and ANGEL RIVERA,)	
Defendants)	

MOTION TO SUPPRESS EVIDENCE

The Defendant, Wilgen Anibal Brito-Melo (hereinafter "Brito-Melo"), moves the Court for an order suppressing evidence seized on or about July 7, 2005 during warrantless searches of a white Ford Taurus and a blue Saab, and pursuant to search warrants for an apartment located at 290 Quarry Street in Quincy, Massachusetts and an apartment located at 6123 Avalon Drive in Weymouth, Massachusetts. The grounds for this motion are set forth fully in the attached memorandum.

The Defendant, Angel Rivera, joins in this motion.

WILGEN ANIBAL BRITO-MELO
By his Attorneys,

/s/ John H. Brazilian
John H. Brazilian
B.B.O. No. 054980
Andrea J. Gonzalez
B.B.O. No. 663753
BUTTERS BRAZILIAN LLP
One Exeter Plaza
Boston, Massachusetts 02116
(617) 367-2600

Dated: February 24, 2006

CERTIFICATE OF SERVICE

I, John H. Brazilian, hereby certify that on this date, the above document was served, by first-class mail, upon the following: J. Thomas Kerner, Esq., at 230 Commercial Street, 1st Floor, Boston, MA 02109, and Peter K. Leavitt, Assistant United States Attorney, United States Attorney's Office, Suite 9200, 1 Courthouse Way, Boston, MA 02210.

/s/ John H. Brazilian
John H. Brazilian